

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA**

In re)	
)	
Stacie Irene Spence)	CASE NO. 14-11752 NLJ
)	CHAPTER 13
Debtor)	

**OBJECTION TO MOTION TO DISMISS,
MOTION TO MODIFY CONFIRMED PLAN,
REQUEST FOR COMPENSATION OF ATTORNEYS FEES,
BRIEF IN SUPPORT
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW Debtor, Stacie Irene Spence, and objects to the Motion to Dismiss of the Chapter 13 Trustee, and Moves the Court for an order modifying the chapter 13 plan confirmed by the court on July 25, 2014 and in support thereof, states as follows:

1. On April 25, 2014, the Debtor filed a Petition under Chapter 13 of the Bankruptcy Code.
2. On July 25, 2014, this Court entered its Order Confirming Plan.
3. Debtor moves to modify the Chapter 13 Plan, to wit:
 - a. The Debtor be treated as current through September, 2014.
 - b. Payments to be \$659.00 per month beginning October, 2014 and for the remainder of the plan.
 - c. To provide that counsel for Debtor receive \$500.00 for post-confirmation services rendered in this matter to be paid pursuant to the Local Guidelines concerning post-confirmation services, and without the necessity of filing an application for the same.
4. The modification is necessary to make the plan feasible and to allow for the proper payment of the proof of claim filed by the OKLAHOMA TAX COMMISSION.

WHEREFORE, premises considered, Debtor respectfully requests this Court issue an Order Modifying Debtor's Chapter 13 Plan. Further, Debtor's attorney requests that she be compensated as requested.

Respectfully submitted,

/s Tearsa Storms Olson

Tearsa Storms Olson OBA#30264
Storms Law Office, PC
2400 NW 23rd St., Suite 102
Oklahoma City, OK 73107
Telephone: (405) 582-0012
Fax: (405) 212-4872
Email: tearsastorms@gmail.com
Attorney for Debtor

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).

CERTIFICATE OF SERVICE

This is to certify that on the **19th** day of **September, 2014**, a true and correct copy of the **Objection to Motion to Dismiss, Motion to Modify Confirmed Plan, Request for Compensation of Attorneys Fees, Brief in Support and Notice of Opportunity for Hearing** [Document No. 24] filed on the **19th** day of **September, 2014** was forwarded via U.S. Mail, first class, postage prepaid, to the following:

All creditors on the attached mailing matrix.

/s/ Tearsa Storms Olson
Tearsa Storms Olson, OBA# 30265

Label Matrix for local noticing
1087-5
Case 14-11752
Western District of Oklahoma
Oklahoma City
Fri Sep 19 18:32:01 CDT 2014

USBC Western District of Oklahoma
215 Dean A. McGee
Oklahoma City, OK 73102-3426

AMCOL Systems, Inc.
Amcol Systems, Inc.
Po Box 21625
Columbia SC 29221-1625

Accident and Trauma Center
PO Box 722290
Norman OK 73070-8731

All American Fitness and Racquetball
Millennium Financial Group
5770 NW Expressway Suite 102
Oklahoma City OK 73132-5238

American InfoSource LP as agent for
Integris Health
PO Box 248838
Oklahoma City, OK 73124-8838

American InfoSource LP as agent for
T Mobile/T-Mobile USA Inc
PO Box 248848
Oklahoma City, OK 73124-8848

Ars /Account Resolution Services
1801 Nw 66th Ave Ste 200
Plantation FL 33313-4571

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

Auto Advantage Finance, Inc.
5350 S. Western Ave., 4th Floor
Oklahoma City, OK 73109-4520

BancFirst
1213 Gordon Cooper Drive
Tecumseh OK 74873-1460

Bancfirst
Po Box 26788
Oklahoma City OK 73126-0788

Caine & Weiner
Po Box 5010
Woodland Hills CA 91365-5010

Cbe Group
131 Tower Park Dri
Waterloo IA 50701-9374

Central OK Chiropractic Clinic
602 N Broadway
Tecumseh OK 74873-2020

Cer Sts Rec
1314 N Main St
Hutchinson KS 67501-4002

Classen Urgent Care
419 W Gray Street
Norman OK 73069-7117

Community Hospital Outpatient Therapy
1001 S Western Ave
Oklahoma City OK 73139

Conn Appliances, Inc. as Attorney-in-Fact an
P.O. Box 2358
Beaumont, Texas 77704-2358

Conns
Box 2358
Beaumont TX 77704-2358

Covington Credit
627 NW 7th Street
Oklahoma City OK 73160-3803

Covington Credit Inc #OK0018
Southern Management Corporation
PO Box 1947
Greenville SC 29602-1947

Crdt Ctrl Co
11821 Rock Landing Dr
Newport News VA 23606-4207

Credit Collections Inc/AMR
Po Box 60607
Oklahoma City OK 73146-0607

Credit Servi
Pob 60566
Oklahoma City OK 73146-0566

Dept of Education
FedLoan Servicing
PO Box 69184
Harrisburg PA 17106-9184

Direct Advertising Consultatns
PO Box 1369
Washington MO 63090-8369

EMSA
1111 Classen Drive
Oklahoma City OK 73103-2607

Empire Finan
102 W Main St
Purcell OK 73080-4220

Enhanced Recovery Corp
Attention: Client Services
8014 Bayberry Rd
Jacksonville FL 32256-7412

Exp Cr Auto
4000 N May
Oklahoma City OK 73112-6269

HSN Flexpay Dept
PO Box 9090
Clearwater FL 33758-9090

IC System
Attn: Bankruptcy
444 Highway 96 East; Po Box 64378
St. Paul MN 55164-0378

Integrus ER Physicians
PO Box 48305
Jacksonville FL 32247-8305

Integrus Health Baptist
PO Box 268907
Oklahoma City OK 73126-8907

Internal Revenue Service
PO Box 7346
Philadelphia PA 19101-7346

Internal Revenue Service - OKC
Mailstop 5024 OKC
55 N Robinson
Oklahoma City OK 73102-9229

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Kankin and Woods Chiropractic
828 Wall Street
Norman OK 73069-6302

Mercy Clinic
PO Box 2580-OK
Springfield MO 65801

Mercy Health Systems
1730 E Portland
Springfield MO 65804-1311

Mercy Hospital
4300 W Memorial Rd
Oklahoma City OK 73120-8304

Mercy Physicians
4300 W Memorial Rd
Oklahoma City OK 73120-8304

Millennium
5770 Nw Expressway Ste 1
Warr Acres OK 73132-5241

National Credit Adjusters
PO Box 3023
Hutchinson KS 67504-3023

OKLAHOMA TAX COMMISSION
General Counsel's Office
120 N. Robinson, Ste 2000W
Oklahoma City, OK 73102-7801

Oklahoma Sports Science and Ortho
3110 SW 89, Suite 102
Oklahoma City OK 73159-7919

(p)OKLAHOMA TAX COMMISSION
120 N ROBINSON
STE 2000W
OKLAHOMA CITY OK 73102-7801

Oklahoma Unemployment Commission
PO Box 52004
Oklahoma City OK 73152-2004

Pottawatomie Telephone Company
PO Box 66
Earlsboro OK 74840-0066

React Emergency
2316 N Airport Drive
Shawnee OK 74804-2624

Security Fin
C/o Security Finan
Spartanburg SC 29304

Shawnee NewsStar
215 N Bell
Shawnee OK 74801-6982

Southwest Regional Imaging and Radiology
3209 NW Expressway
Oklahoma City OK 73112-4131

Southwestern Bell Telephone Company
% AT&T Services, Inc
Karen Cavagnaro, Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

Stapleton Law
PO Box 720981
Norman OK 73070-4759

Steven Richards
PO Box 36-0119
Oklahoma City OK 73196-0001

Tab Services
PO Box 52039
Tulsa OK 74152-0039

Thai An Doan DDS PC
11318 N May Ave Ste B
Oklahoma City OK 73120-5843

U.S. Trustee
United States Trustee
215 Dean A. McGee Ave., 4th Floor
Oklahoma City, OK 73102-3444

Unity
1900 Gordon Cooper Drive
Shawnee OK 74801-8603

Valarity Llc
P O Box 505023
Saint Louis MO 63150-5023

Webbnk/fstr
6250 Ridgewood Rd
Saint Cloud MN 56303-0820

cox communications
po box 470800
tulsa, OK 74147-0800

John T. Hardeman
PO Box 1948
Oklahoma City, OK 73101-1948

(c)STACIE IRENE SPENCE
5475 156TH ST
NOBLE OK 73068-6723

Tearsa Storms Olson
Storms Law Office
2400 NW 23rd St., Ste. 102
Oklahoma City, OK 73107-2438

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Oklahoma Tax Commission
Bankruptcy Section
General Counsel
Box 53248
Oklahoma City OK 73152-3248

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Stacie Irene Spence
5475 SE 156th
Noble, OK 73068

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Auto Advantage Finance, Inc.

End of Label Matrix	
Mailable recipients	66
Bypassed recipients	1
Total	67